

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HANGZHOU CHIC INTELLIGENT)	
TECHNOLOGY CO. and UNICORN)	
GLOBAL, INC.,)	
)	
Plaintiffs,)	Case No. 20-cv-4806
)	
v.)	Judge Thomas M. Durkin
)	Magistrate Judge Jeffrey Cole
THE PARTNERSHIPS AND)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A,)	
)	
)	
Defendants.)	
)	

MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiffs Hangzhou Chic Intelligent Technology Co., and Unicorn Global, Inc. (“Plaintiffs”) seek entry of the current preliminary injunction against the defendants in Schedule A amended on May 6, 2021. Those defendants include Gyroor (including the stores gyroorboard.com, and gyroor.com), Jiangyou-US, Gyroshoes, Fengchi-US, HGSM, Gaodeshang-US, and Urbanmax (“Gyroor Defendants”). The Court directed Plaintiffs to file this motion as to two of those defendants on August 9. *See* Dkts. 359, 374.

The Gyroor Defendants have raised various procedural issues associated with the current preliminary injunction and questioned whether certain Gyroor Defendants are bound by that injunction. Plaintiffs have maintained all along that the Gyroor Defendants are currently enjoined, at a minimum, by acting in concert and participation with each other or Gyroor-US to perpetuate their collectively infringing activities. Rather than brief those issues on a piece meal basis and further burden the Court’s resources, Plaintiffs now move as an opportunity for these Gyroor

Defendants to contest a PI on the merits, thereby mooted any procedural issues. A Memorandum of Law in Support of this Motion and supporting Declarations are filed concurrently.

Date: August 24, 2021

Respectfully Submitted,

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